

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

RECEIVEDUNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

JUN 30 2023

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

MR. CHRISTOPHER CHESNUT)
3931 N. ASHLAND AVE APT 1)
CHICAGO, IL 60613)
 Plaintiff(s),)
)
 v.)
CHICAGO PUBLIC SCHOOLS)
42 W. MADISON STREET)
CHICAGO, IL 60602)
 Defendant(s).)

Case 1:23-cv-04230
 Judge Harry D. Leinenweber
 Magistrate Judge Young B. Kim
 RANDOM ASSIGNMENT

COMPLAINT OF EMPLOYMENT DISCRIMINATION

1. This is an action for employment discrimination.
2. The plaintiff is a resident of the
 county of Cook in the state of Illinois.
3. The defendant is a public school district / an employer of plaintiff, whose
 street address is 42 W MADISON STREET,
 (city) CHICAGO (county) COOK (state) IL (ZIP) 60602
 (Defendant's telephone number) () - _____
4. The plaintiff sought employment or was employed by the defendant at (street address)
Taft High School / Freshman Academy
6530 W. Bryn Mawr / 4017 N. Oak Park Dr. (city) CHICAGO
 (county) Cook (state) IL (ZIP code) 60631

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5. The plaintiff [*check one box*]

- (a) ☐ was denied employment by the defendant.
- (b) ☒ was hired and is still employed by the defendant.
- (c) ☐ was employed but is no longer employed by the defendant.

6. The defendant discriminated against the plaintiff on or about, or beginning on or about, (month) JANUARY, (day) 27, (year) 2022.

7.1 (*Choose paragraph 7.1 or 7.2, do not complete both.*)

(a) The defendant is not a federal governmental agency, and the plaintiff [*check one box*] ☒ has ☒ has not filed a charge or charges against the defendant asserting the acts of discrimination indicated in this complaint with any of the following government agencies:

- (i) ☒ the United States Equal Employment Opportunity Commission, on or about (month) AUGUST (day) 10 (year) 2022.
- (ii) ☐ the Illinois Department of Human Rights, on or about (month) _____ (day) _____ (year) _____.

(b) If charges *were* filed with an agency indicated above, a copy of the charge is attached. ☒ Yes, ☐ No, **but plaintiff will file a copy of the charge within 14 days.**

It is the policy of both the Equal Employment Opportunity Commission and the Illinois Department of Human Rights to cross-file with the other agency all charges received. The plaintiff has no reason to believe that this policy was not followed in this case.

7.2 The defendant is a federal governmental agency, and

(a) the plaintiff previously filed a Complaint of Employment Discrimination with the

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

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defendant asserting the acts of discrimination indicated in this court complaint.

☒ Yes (month) FEBRUARY (day) 22 (year) 2023

☐ No, did not file Complaint of Employment Discrimination

(b) The plaintiff received a Final Agency Decision on (month) N/A - NOT REC'D
(day) _____ (year) _____.

(c) Attached is a copy of the

(i) Complaint of Employment Discrimination,

☐ Yes ☐ No, but a copy will be filed within 14 days.

(ii) Final Agency Decision

☐ Yes ☐ NO, but a copy will be filed within 14 days.

8. *(Complete paragraph 8 only if defendant is not a federal governmental agency.)*

(a) ☐ the United States Equal Employment Opportunity Commission has not
issued a *Notice of Right to Sue*.

(b) ☒ the United States Equal Employment Opportunity Commission has issued
a *Notice of Right to Sue*, which was received by the plaintiff on
(month) MAY (day) _____ (year) _____ a copy of which
Notice is attached to this complaint.

9. The defendant discriminated against the plaintiff because of the plaintiff's [***check only those that apply***]:

(a) ☐ Age (Age Discrimination Employment Act).

(b) ☐ Color (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

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- (c) ☐ Disability (Americans with Disabilities Act or Rehabilitation Act)
 - (d) ☒ National Origin (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
 - (e) ☐ Race (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
 - (f) ☐ Religion (Title VII of the Civil Rights Act of 1964)
 - (g) ☐ Sex (Title VII of the Civil Rights Act of 1964)
10. If the defendant is a state, county, municipal (city, town or village) or other local governmental agency, plaintiff further alleges discrimination on the basis of race, color, or national origin (42 U.S.C. § 1983).
11. Jurisdiction over the statutory violation alleged is conferred as follows: for Title VII claims by 28 U.S.C. §1331, 28 U.S.C. §1343(a)(3), and 42 U.S.C. §2000e-5(f)(3); for 42 U.S.C. §1981 and §1983 by 42 U.S.C. §1988; for the A.D.E.A. by 42 U.S.C. §12117; for the Rehabilitation Act, 29 U.S.C. § 791.
12. The defendant [*check only those that apply*]
- (a) ☐ failed to hire the plaintiff.
 - (b) ☐ terminated the plaintiff's employment.
 - (c) ☐ failed to promote the plaintiff.
 - (d) ☐ failed to reasonably accommodate the plaintiff's religion.
 - (e) ☐ failed to reasonably accommodate the plaintiff's disabilities.
 - (f) ☒ failed to stop harassment;
 - (g) ☒ retaliated against the plaintiff because the plaintiff did something to assert rights protected by the laws identified in paragraphs 9 and 10 above;
 - (h) ☐ other (specify): _____

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

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13. The facts supporting the plaintiff's claim of discrimination are as follows:

THE DEFENDANT HAS BLINDLY SIDED WITH THE TAF+ ADMINISTRATION
THROUGHTOUT THE COMPLAINT AND GRIEVANCE PROCESS, AND HAVE
FAILED TO PROVIDE ME EQUAL PROTECTIONS. THE ADMINISTRATION MADE
A FALSE POLICE REPORT (F)F127696) AGAINST ME, FOR WHICH
CHICAGO PUBLIC SCHOOLS IS LIABLE. I BELIEVE THESE ACTIONS WERE
TAKEN IN RETALIATION FOR PROTECTED ACTIVITIES, AND WERE MADE DUE TO
MY ARAB-AMERICAN ANCESTRY.

14. **[AGE DISCRIMINATION ONLY]** Defendant knowingly, intentionally, and willfully discriminated against the plaintiff.

15. The plaintiff demands that the case be tried by a jury. ☐ Yes ☒ No

16. THEREFORE, the plaintiff asks that the court grant the following relief to the plaintiff **[check only those that apply]**

- (a) ☐ Direct the defendant to hire the plaintiff.
- (b) ☐ Direct the defendant to re-employ the plaintiff.
- (c) ☐ Direct the defendant to promote the plaintiff.
- (d) ☐ Direct the defendant to reasonably accommodate the plaintiff's religion.
- (e) ☐ Direct the defendant to reasonably accommodate the plaintiff's disabilities.
- (f) ☒ Direct the defendant to (specify): CEASE AND DESIST RETALIATING
AGAINST THE PLAINTIFF, RETRACT THE FALSE STATEMENTS MADE TO
POLICE AND ASSUME RESPONSIBILITY FOR THIS CRIMINAL VIOLATION;

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

AND COMPENSATE THE PLAINTIFF FOR LOSS OF TUITION WAIVERS,
THE EXTRA CLASS TAUGHT ON 1/27/22, AND FOR PAIN & SUFFERING
CAUSED AS A RESULT THEREOF.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

- (g) ☒ If available, grant the plaintiff appropriate injunctive relief, lost wages, liquidated/double damages, front pay, compensatory damages, punitive damages, prejudgment interest, post-judgment interest, and costs, including reasonable attorney fees and expert witness fees.
- (h) ☒ Grant such other relief as the Court may find appropriate.



(Plaintiff's signature)

CHRISTOPHER CHESNUT

(Plaintiff's name)

3931 N. ASHLAND AVE.

(Plaintiff's street address)

(City) CHICAGO (State) IL (ZIP) 60613

(Plaintiff's telephone number) (773) - 677-4706

Date: 06/30/2023

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.	Charge Presented To: Agency(ies) Charge No(s): EEOC 440-2022-04700 FEPA
Illinois Department Of Human Rights and EEOC _____ <i>State or local Agency, if any</i>	

Name (indicate Mr., Ms., Mrs.) Mr. Christopher Chesnut	Home Phone 773-677-4706	Year of Birth
---	----------------------------	---------------

Street Address 3931 N Ashland Ave CHICAGO, IL 60613

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name Chicago Public Schools	No. Employees, Members 501+ Employees	Phone No.
--------------------------------	--	-----------

Street Address 42 West Madison Street CHICAGO, IL 60602

Name	No. Employees, Members	Phone No.
------	------------------------	-----------

Street Address	City, State and ZIP Code
----------------	--------------------------

DISCRIMINATION BASED ON National Origin, Retaliation	DATE(S) DISCRIMINATION TOOK PLACE <table> <tr> <td>Earliest</td> <td>Latest</td> </tr> <tr> <td>09/01/2019</td> <td>08/09/2022</td> </tr> </table> Continuing Action	Earliest	Latest	09/01/2019	08/09/2022
Earliest	Latest				
09/01/2019	08/09/2022				

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): I began my employment with Respondent in or around February 2011. My most recent position title is Regular Teacher. During my employment, I was subjected to harassment based on my national origin. I complained to Respondent on multiple occasions. Subsequently, I was denied benefits and disciplined. On or about January 31, 2022, I was temporarily reassigned. As of today, Respondent has not informed me of when I will be able to return to work. I believe I have been discriminated against because of my national origin, Lebanese, and in retaliation for engaging in protected activity, in violation of Title VII of the Civil Rights Act of 1964, as amended.	
---	--

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures. I declare under penalty of perjury that the above is true and correct. Digitally Signed By: Mr. Christopher Chesnut 08/10/2022 <i>Charging Party Signature</i>	NOTARY – When necessary for State and Local Agency Requirements I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)
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U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Houston District Office
1919 Smith Street, 6th Floor
Houston, TX 77002
(346) 327-7700
Website: www.eeoc.gov

DETERMINATION AND NOTICE OF RIGHTS

(This Notice replaces EEOC FORMS 161 & 161-A)

Issued On: 05/12/2023

To: Mr. Christopher Chesnut
3931 N Ashland Ave
CHICAGO, IL 60613
Charge No: 440-2022-04700

EEOC Representative and email: ASHLEY WALLER
Investigator
Ashley.Waller@eeoc.gov

DETERMINATION OF CHARGE

The EEOC issues the following determination: The EEOC will not proceed further with its investigation and makes no determination about whether further investigation would establish violations of the statute. This does not mean the claims have no merit. This determination does not certify that the respondent is in compliance with the statutes. The EEOC makes no finding as to the merits of any other issues that might be construed as having been raised by this charge.

NOTICE OF YOUR RIGHT TO SUE

This is official notice from the EEOC of the dismissal of your charge and of your right to sue. If you choose to file a lawsuit against the respondent(s) on this charge under federal law in federal or state court, **your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice.** Receipt generally occurs on the date that you (or your representative) view this document. You should keep a record of the date you received this notice. Your right to sue based on this charge will be lost if you do not file a lawsuit in court within 90 days. (The time limit for filing a lawsuit based on a claim under state law may be different.)

If you file a lawsuit based on this charge, please sign-in to the EEOC Public Portal and upload the court complaint to charge 440-2022-04700.

On behalf of the Commission,

Digitally Signed By: Rayford O. Irvin
05/12/2023

Rayford O. Irvin
District Director

Cc:

Christina Rosenberg
Board of Education of the City of Chicago
1 N DEARBORN ST STE 900
Chicago, IL 60602

Elizabeth Barton
1 North Dearborn Suite 900
Chicago, IL 60602

Please retain this notice for your records.



Chesnut, Christopher <clchestnut@cps.edu>

Prior Complaint and Retaliation

Chesnut, Christopher <clchestnut@cps.edu>

To: "Compliance Office, Equal Opportunity" <eoco@cps.edu>

Cc: "Cervantes, Adriana" <adrianacervantes@ctulocal1.org>

Mon, Jun 20, 2022 at 8:39 AM

Good Morning,

I spoke with the EOCO back in February about this matter, and they declined to investigate and referred the matter to the CPS Legal Department. I have tried to follow up with them, but they have declined to investigate the matter. In light of recent developments, I think your office should have been involved initially rather than wasting my time by sending it to the Law Department, which is unwilling to enforce their own ethics and equal employment rules. I can be available to speak with you again tomorrow, Tuesday, at 10:00 am, or Wednesday at 10:00 am via GChat.

Thank you.

On Fri, Jun 17, 2022 at 3:57 PM Compliance Office, Equal Opportunity <eoco@cps.edu> wrote:

Good Afternoon Christopher Chestnut,

This is the Chicago Public Schools (CPS) Equal Opportunity Compliance Office (EOCO). We received information that you may be uncomfortable during interactions with another staffer and would like to have a conversation with you. Please be advised this is not an investigation we are meeting to gather more information to see if/how we will proceed.

To give you a bit of background on our office... CPS-EOCO evaluates whether certain behavior violates the CPS [Non-Discrimination, Harassment, Sexual Harassment, Sexual Misconduct and Retaliation Policy](#). Specifically, the EOCO investigates complaints of discrimination or harassment towards individuals due to the person's real or implied membership in one or more Protected Categories, sexual harassment or misconduct, or retaliation for having made a complaint or report of discrimination or harassment that is based on a person's real or implied membership in one or more Protected Categories, or having participated in an investigation of discrimination or harassment against any covered individual. To file a complaint with the EOCO, you can submit a complaint form online via the EOCO website [here](#).

We would like to have a brief (optional) conversation (15 minutes) with you, please respond to this email and let us know your availability (please give 2 dates/times) between the hours of 9:30-4:00. The conversation would take place via phone or Google Meet (video) and can even take place during your work day. If you do not wish to have a conversation, please let us know that you do not need additional support, please let us know by responding to this email.

EOCO | Chicago Public Schools
Office of Student Protections & Title IX
110 N. Paulina St. | Chicago, Illinois 60612
(p) 773/553-1013
(f) 773/534-0778

CPS Non-Discrimination Statement

EOCO Quick Guide [English](#) | [Spanish](#)

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On Thu, Jun 16, 2022 at 9:49 AM Chesnut, Christopher <clchestnut@cps.edu> wrote:

We would like to refer the following matter back to the EOCO for investigation.

Thank you

----- Forwarded message -----

From: Chesnut, Christopher <clchestnut@cps.edu>

Date: Tue, Jun 14, 2022 at 11:28 AM

Subject: Re: Prior Complaint and Retaliation

To: Cervantes, Adriana <adrianacervantes@ctulocal1.org>

I also was not yet aware that Grishaber and Colon were conspiring to deny me Sick pay for January 17-19 when I last spoke to the EOCO.

On Mon, Jun 13, 2022 at 11:52 AM Chesnut, Christopher <clchestnut@cps.edu> wrote:

I think this is a mistake - I had not previously made the connection between my 2019 EOCO complaint and the 2022 one concerning my removal. I think this matter should be referred back to the EOCO in light of this new information I have introduced.

On Mon, Jun 13, 2022 at 9:07 AM Williams, Mylana <mrwilliams26@cps.edu> wrote:

Good morning Ms. Chesnut,

After further review of this matter, the Law Department is unable to move forward with an investigation. Please refer all concerns to your union representative.

On Sun, Jun 12, 2022 at 12:14 PM Chesnut, Christopher <clchestnut@cps.edu> wrote:

Recommendation for Matthew Adamczyk (1).docx

Recommendation for Todd Pagos.docx

MarkOsamorPrincipalDiscretionRecommendation.doc

Letter of Recommendation for Angela Knapp.docx

Recommendation - Diana Hernandez

Recommendation for Daniela Herrera.docx

Ms. Williams,

Attached are some examples of letters of recommendation I have written for my students over the years. Being both a coach and a teacher has allowed me to get to know my students and support their future ambitions. It was around the time that I began coaching that some other teachers in the Language Acquisition/World Language Department began to work together to organize a study-abroad trip to Spain and France over spring break. They organized this through the company EF: Education First International Language School, which I previously worked for as a substitute teacher, teaching English as a Foreign Language at their downtown Chicago campus (they offered me a full time job, but my ambitions kept me working with the Chicago Public School system).

I have never been to Spain and have always wanted to go, ever since I started studying Spanish at Waubesa Valley High School in 1994. I have had experience traveling and teaching abroad, which I did through my graduate school National Louis University and with the cooperation of Educators Abroad (attached is my Summative Report, which began my tradition of excellence in my teaching evaluations that was only ended by Grishaber's bias against me).

The other teachers for some reason repeatedly excluded me from planning and chaperoning our school's study abroad excursions, which became semi-annual. I repeatedly expressed my desire to participate in this trip, but was never allowed to join. One of the special education teachers who worked with our department at that time, Lisa Wagner, repeatedly got to go in my place, and the excuse I was given (after the fact) was that they needed another female chaperone instead of me.

Tired of being excluded from my department, I moved to the Freshman Academy when it opened in the fall of 2019 to continue to work with the Academic Center and coach Boys Varsity Golf. Lisa Wagner gave me a hard time about sitting by her at an opening meeting, and then I observed her sending texts to a group titled, "Chat without Chris" or "Chat without Chesnut". At the first sign that the discrimination I had felt at the Varsity Campus would follow me to this new school, I reported it to Kerstan Crowe, who reported it to the EOCO. They followed up with me and, because the EOCO could not determine how I fit into a protected category, they referred the complaint to Taft's administration to handle.

I heard that several administrators met with the teachers I identified as participating in this discrimination, but never heard back from them as to how the matter was addressed or resolved. When I spoke individually with Lisa Wagner about it, as she was assigned to be my cooperating teacher for my Inclusion Classes that year, I got a sense of why they were excluding me. She told me that since 9/11/01, when Arab terrorists attacked the United States, she has carried a bullet-proof plate in her purse. As I am half-Lebanese and have a Middle Eastern complexion, I took this to be directed at me.

When I was sick after winter break this year and notified the appropriate administrators and clerks of my need to use my Sick time off, I detected some interference. I noted to Maribel Gorgas, the clerk at the Freshman Academy, that I had applied the appropriate request through Kronos and should receive approval, but that my request had been retracted. I submitted the request again believing it would be approved. I now believe that the Payroll Clerk at the Varsity Campus, Bianca Colon, retracted my request for sick time off without informing me at the direction of Mark Grishaber, just as he directed Eric Flores to rate me Basic and continues to spread his bias against me to others.

I requested a Historical Correction to again ask for my sick day pay to be approved, and Grishaber and Colon refused. Only after I filed a grievance through the CTU did they approve my sick day pay, but Colon lied and said that I never requested the benefit days. Grishaber apparently supported this lie, just as he supported Flores in giving me biased evaluations his first year as principal.

The week after I returned from being out sick with Strep Throat, on the last day of the semester- 01/27/22- when grades were due, Bianca Colon assigned me to substitute teach an extra class at 8:00 pm the night before so that I could not plan for it. This may have also been at the direction of Mark Grishaber. When I informed her that it was an inconvenience, not to mention a violation of our contract, she asked me if I was "refusing to cover for a colleague," which I believe was also at the direction of Mark Grishaber in an effort to provoke a negative response from me. Grishaber states that he was "told and sent an email" informing him that I had refused, which may also have been a lie.

Melissa Hess copied my statement to Bianca Colon to me and several administrators and clerks and again asked me to clarify if I was refusing, obviously at the direction of Mark Grishaber. I clarified my statements to Ms. Colon and continued fulfilling my duties. Mrs. Hess then entered the classroom to which I was assigned coverage and told me "I got it." I did not know what this meant, so I remained in the room as assigned and continued to plan for my classes and evaluate assessments due that day.

Grishaber accused me of insubordination based on the false premise that I refused the substitute teaching assignment, which I complied with even though it was inconvenient and he does not intend to pay me for. He had me removed from my position by claiming that I was insubordinate "in front of students." I assume he is being aggressive with me to support his fellow administrator, and I feel personally attacked. I await the Law Department's investigation into the allegations of Harassment that I have made, as Grishaber has created a hostile work environment at Taft and for me specifically. I also expect the baseless allegations of Insubordination made against me to be dismissed and for me to be restored to a non-hostile work environment.

Sincerely,

—

Christopher Chesnut
Spanish Teacher
William Howard Taft High School

--

Kind Regards,

Mylena Rose Williams | Investigator , Investigations Unit
Chicago Board of Education | Department of Law
1 North Dearborn St | 9th Floor | Chicago, IL 60602
General: 773-553-2120 | Facsimile: 773-553-1476
Direct: 773-553-1476

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ReplyReply allForward

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Christopher Chesnut
Spanish Teacher
[William Howard Taft High School](#)

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Spanish Teacher
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Spanish Teacher
[William Howard Taft High School](#)

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Christopher Chesnut
Spanish Teacher
[William Howard Taft High School](#)



Christopher Chesnut <chris.chesnut@gmail.com>

Evidence of Discrimination and Retaliation

4 messages

Christopher Chesnut <chris.chesnut@gmail.com>

Wed, Oct 12, 2022 at 1:52 PM

To: MARINA.RAVELO@eeoc.gov

Cc: "Cervantes, Adriana" <AdrianaCervantes@ctulocal1.org>

Re: EEOC Charge Number: 440-2022-04700

In Fall 2019 I made a complaint of discrimination against two fellow teachers, Lisa Wagner and Jessica Bezold-Plencner, to my former Department Chair, Mr. Kerstan Crowe. Mr. Crowe forwarded my complaint to Assistant Principal Ryan Glowacz, who forwarded the complaint to Chicago Public Schools' Equal Opportunity Compliance Office, which referred the complaint back to the administration of Taft High School to resolve.

In order to address the complaint, I asked Ryan Glowacz to speak to the teachers of whom I complained. Lisa Wagner, who was assigned to be my Inclusion Teacher that school year, asked me in our classroom why I complained, and I informed her of how I felt excluded from a Language Acquisition Department function by not being allowed to chaperone international trips to Spain, France, and the World Studies Department trip to Peru, all of which she had chaperoned along with other teachers from these departments (she is a member of the Diverse Learners Department). In response, she confided in me that "since 9-11 [she has] carried a bullet-proof plate in [her] purse." As I am half-Lebanese, I took this to mean that she felt justified in excluding me due to my ethnicity.

Afterwards the Principal, Mark Grishaber, along with Ryan Glowacz, met with the two teachers I complained about, but never got back to me about a resolution. Several emergency situations arose - namely a Fall 2019 Chicago Teachers Union strike and the Spring 2020 COVID-19 Pandemic, which closed the schools, and I went into isolation fearing retaliation for having complained.

In November 2020, Mr. Grishaber mandated that I attend a professional development meeting during my duty-free lunch period, during which time he insulted and threatened me with discipline. I felt that this interaction was an act of retaliation for having complained of discrimination.

In January 2022, during a CPS teacher lock-out, I came down with symptoms that the COVID-19 emergency protocol required me to stay home sick. When I did not improve after several days I saw my doctor and got a prescription for antibiotics, but the Payroll Clerk Bianca Colon who works in the main office with Mr. Grishaber retracted my request for sick time off without explanation, for which I had to file a grievance for payment. I felt that these measures were retaliatory and provocative.

Once I returned to work, less than a week before the conclusion of the first semester, I began catching up and preparing to mentor my first Student-Teacher. At 8:00 pm on the night before the last day of the semester, while I was still catching up on exams and grades, the Payroll Clerk assigned me Substitute Teacher duties that day for which I was unable to prepare. I complained that this assignment was an inconvenience and seemed to violate the Collective Bargaining Agreement, since this was the first day of the implementation of Mr. Grishaber's Emergency Class Coverage Policy, and I felt that given the circumstances I should not have been first-called for this duty on the first day of this new policy (the CBA states that "teachers shall be subject to last call" 27.3). I fulfilled the assignment anyways, but was still accused of Insubordination by Mr. Grishaber.

I then contacted the Network Chief, Dr. Laura Lemone, to complain of Mr. Grishaber's intimidating and hostile actions taken towards me since making my Fall 2019 complaint and not speaking to me about it, as I feared an escalation of this retaliation. She agreed to speak with me, but on the day we were supposed to talk Mr. Grishaber had me removed from my classroom and school, alleging Insubordination, and Dr. Lemone cancelled our conference. I suspected that Mr. Grishaber had made false allegations against me to Dr. Lemone in order to prevent me from being able to complain about him.

In February 2022 I complained to the CPS EOCO of harassment, detailed my long history of mistreatment by Mr. Grishaber, and hoped for support. The EOCO referred my complaint to the Law Department, which failed to respond to me when I tried to follow-up with them, presumably due to their having a bias against me due to false allegations made against me.

In March 2022 I attempted to make a historical correction for payment of my sick days from January, and gave the reason that the Payroll Clerk retracted my request for sick time off with no explanation, but Mr. Grishaber denied this request. I then filed a grievance for payment, and in his response Mr. Grishaber alleged that I never requested the days off. This is a false statement, which I feel is further evidence of retaliation.

In June 2022 I attempted to make an ethics complaint against the Taft Administration to the Law Department, but they declined to investigate. Therefore I referred my own complaint of a Prior Complaint and Retaliation back to the EOCO to investigate, which they have yet to do. The director of this department with whom I spoke - Ms. Udemé Itiat - informed me that they would initiate an investigation "sometime shortly after the July 4 holiday," and that I should expect to be contacted by her office at that time, but I did not hear from the EEOC Investigator all summer. I then filed a grievance

1/20/23, 11:18 AM

Gmail - Evidence of Discrimination and Retaliation
alleging discrimination and retaliation, which the Law Department rejected due to Mr. Grishaber's assertion that I was being disciplined for a serious matter - presumably other than the charge of insubordination which he used to remove me from my classroom and school.

In August 2022 I was informed of an investigation into alleged misconduct. I met with the Investigator - Ms. Pamela Laughlin Childs <plarchilghthnv@gmail.com> - for over three hours, and learned of the nature of the false allegations made against me by Lisa Wagner, whom I complained of in Fall 2019. As she remained my inclusion teacher after I had complained about her, I suspect that she was taking notes on my interactions with students and portraying them as discriminatory. The allegations made against me since complaining of mistreatment by Lisa Wagner in Fall 2019 were retaliatory, and that Mr. Grishaber's bias against me enabled such retaliation. This confirms to me that all of the allegations made against me since complaining of mistreatment by Lisa Wagner in Fall 2019 were retaliatory, and that Mr. Grishaber's bias against me enabled such retaliation. In October 2022 I was finally contacted by an EOCO Investigator - Ms. Khyra Kolidakis - but had no record of my having that she had spoken with Mr. Grishaber and recorded his false allegations against me, but had no record of my having complained to the EOCO. The next day I had a hearing with the Office of Administrative Hearings over the payment for defend the false allegations made against me. I feel that since I have disproved the allegation of insubordination, they have now taken the side of Mr. Grishaber and the false allegations are retaliatory and were made due to my Middle Eastern ancestry, and that CPS is now liable for Mr. Grishaber's discriminatory treatment of myself.

Please let me know if you need any further information.

Sincerely,
Christopher Chesnut

Mon, Dec 12, 2022 at 3:42 PM

Christopher Chesnut <chris.chesnut@gmail.com>
To: MARINA.RAVELLO@eeoc.gov
Cc: "Cervantes, Adriana" <AdrianaCervantes@ctulocal1.org>

Have there been any updates to the status of this matter? I would appreciate knowing where it stands before winter break.

Sincerely,
Christopher Chesnut
Sent from my iPhone

On Oct 12, 2022, at 1:52 PM, Christopher Chesnut <chris.chesnut@gmail.com> wrote:

[Quoted text hidden]

MARINA RAVELLO <MARINA.RAVELLO@eeoc.gov>
To: Christopher Chesnut <chris.chesnut@gmail.com>
Cc: "Cervantes, Adriana" <AdrianaCervantes@ctulocal1.org>

I do not have an update at this time. As mentioned to you in our call in October, management would be reviewing the charge, if EEOC declines to continue investigating the charge, a Dismissal and Notice of Right to Sue would be issued and you would have 90 days to file a lawsuit in federal court.

From: Christopher Chesnut <chris.chesnut@gmail.com>
Sent: Monday, December 12, 2022 3:43 PM
To: MARINA RAVELLO <MARINA.RAVELLO@EEOC.GOV>
Cc: Cervantes, Adriana <AdrianaCervantes@ctulocal1.org>
Subject: Re: Evidence of Discrimination and Retaliation

CAUTION: The sender of this message is external to the EEOC network. Please use care when clicking on links and responding with sensitive information. Forward suspicious emails to phishing@eeoc.gov.

[Quoted text hidden]

Christopher Chesnut <chris.chesnut@gmail.com>
To: MARINA RAVELO <MARINA.RAVELO@eeoc.gov>
Cc: "Cervantes, Adriana" <AdrianaCervantes@ctulocal1.org>

Mon, Dec 12, 2022 at 6:01 PM

Okay, please keep me updated when you are able to do so. Thank you for your continued efforts to mediate in this matter.

Sent from my iPhone

On Dec 12, 2022, at 4:06 PM, MARINA RAVELO <MARINA.RAVELO@eeoc.gov> wrote:

[Quoted text hidden]



IR #: 175060

Reported By: Christopher L Chesnut

Reported Date and Time: Feb 22, 2023 1:48 pm

Incident Type: EOCO Guest Report

Date: Feb 22, 2023

Time: 1:00 pm

Location Info: Both In School and Out of School

Building: None

Involved Parties: Mark Grishaber

Are you a CPS employee? Yes

Are you reporting an incident of sexual misconduct involving one or more students? No

Email address: clchestnut@cps.edu

Name of Complainant: Christopher Chesnut

Employee ID #: 000218890

Job Title: Regular Teacher

School Name: TAFT HS

Work Address: 6530 W Bryn Mawr Rd

Home Address: 3931 N Ashland Ave

Home/Cell Phone Number: 773-677-4706

Basis for Complaint (select all that apply) Discrimination, Harassment, Retaliation, School-Based Investigation

Protected Category (actual or perceived) the Discrimination is based on (select all that apply) Marital/Registered Domestic Partner Status, Nationality/National Origin

Protected Category (actual or perceived) the Harassment is based on (select all that apply) **Marital/Registered Domestic Partner Status, Nationality/National Origin**

Please indicate the date you made a prior complaint of Discrimination, Harassment, Sexual Harassment, or Sexual Misconduct **Jan 27, 2022**

Please indicate the person/department/agency to whom you made the prior complaint of Discrimination, Harassment, Sexual Harassment, or Sexual Misconduct. **Dr. Laura Lemone, Network Chief**

Date the Alleged Incident was First Reported **Jun 16, 2022**

To Whom Complainant Reported Alleged Incident (names and contact information) **Law Department, EOCO**

Name, job title, location, and telephone number of each individual who allegedly violated CPS Board policy and their employment relationship to the complainant. **Lisa Wagner, Special Ed. Inclusion Teacher; Mark Grishaber, Principal**

Description of the alleged incident(s). Please provide a chronological narrative of each incident of discrimination and/or harassment and the reason why you believe it was discriminatory based on a protected class.

In Fall 2019 I made a complaint of discrimination against two fellow teachers, Lisa Wagner and Jessica Bezold-Plencner, to my former Department Chair, Mr. Kerstan Crowe. Mr. Crowe forwarded my complaint to Assistant Principal Ryan Glowacz, who forwarded the complaint to Chicago Public Schools' Equal Opportunity Compliance Office, which referred the complaint back to the administration of Taft High School to resolve. In order to address the complaint, I asked Ryan Glowacz to speak to the teachers of whom I complained. Lisa Wagner, who was assigned to be my Inclusion Teacher that school year, asked me in our classroom why I complained, and I informed her of how I felt excluded from a Language Acquisition Department function by not being allowed to chaperone international trips to Spain, France, and the World Studies Department trip to Peru, all of which she had chaperoned along with other teachers from these departments (she is a member of the Diverse Learners Department). In response, she confided in me that "since 9-11 [she has] carried a bullet-proof plate in [her] purse." As I am half-Lebanese, I took this to mean that she felt justified in excluding me due to my ethnicity. Afterwards the Principal, Mark Grishaber, along with Ryan Glowacz, met with the two teachers I complained about, but never got back to me about a resolution. Several emergency situations arose - namely a Fall 2019 Chicago Teachers Union strike and the Spring 2020 COVID-19 Pandemic, which closed the schools, and I went into isolation fearing retaliation for having complained. In November 2020, Mr. Grishaber mandated that I attend a professional development meeting during my duty-free lunch period, during which time he insulted and threatened me with discipline. I felt that this interaction was an act of retaliation for having complained of discrimination. In January 2022, during a CPS teacher lock-out, I came down with symptoms that the COVID-19 emergency protocol required me to stay home sick. When I did not improve after several days I saw my doctor and got a prescription for antibiotics, but the Payroll Clerk Blanca Colon who works in the main office with Mr. Grishaber retracted my request for sick time off without explanation, for which I had to file a grievance for payment. I felt that these measures were retaliatory and provocative. Once I returned to work, less than a week before the conclusion of the first semester, I began catching up and preparing to mentor my first Student-Teacher. At 8:00 pm on the night before the last day of the semester, 1/27, while I was still catching up on exams and grades, the Payroll Clerk assigned me Substitute Teacher duties that day for which I was unable to prepare. I complained that this assignment was an inconvenience and seemed to violate the Collective Bargaining Agreement, since this was the first day of the implementation of Mr. Grishaber's Emergency Class Coverage Policy, and I felt that given the circumstances I should not have been first-called for this duty on the first day of this new policy (the CBA states that "teachers shall be subject to last call" 27.3). I fulfilled the assignment anyways, but was still

accused of Insubordination by Mr. Grishaber. I then contacted the Network Chief, Dr. Laura Lemone on January 27 to complain of Mr. Grishaber's intimidating and hostile actions taken towards me since making my Fall 2019 complaint and not speaking to me about it, as I feared an escalation of this retaliation. She agreed to speak with me on the 28th, but on the day we were supposed to talk - Monday, January 31 - Mr. Grishaber had me removed from my classroom and school, alleging Insubordination, and Dr. Lemone cancelled our conference. I suspected that Mr. Grishaber had spread false allegations against me to Dr. Lemone in order to prevent me from being able to complain about him. In February 2022 I complained to the CPS EOCO of harassment, detailed my long history of mistreatment by Mr. Grishaber, and hoped for support. The EOCO referred my complaint to the Law Department, which failed to respond to me when I tried to follow-up with them, presumably due to their having a bias against me due to false allegations made against me. In March 2022 I attempted to make a historical correction for payment of my sick days from January, and gave the reason that the Payroll Clerk retracted my request for sick time off with no explanation, but Mr. Grishaber denied this request. I then filed a grievance for payment, and in his response Mr. Grishaber alleged that I never requested the days off. This is a false statement, which I feel is further evidence of retaliation. In June 2022 I attempted to make an ethics complaint against the Taft Administration to the Law Department, but they declined to investigate. Therefore I referred my own complaint of a Prior Complaint and Retaliation back to the EOCO to investigate, which they have yet to do. The director of this department with whom I spoke - Ms. Udemetlat - informed me that they would initiate an investigation "sometime shortly after the July 4 holiday," and that I should expect to be contacted by her office at that time, but I did not hear from the EOCO Investigator all summer. I then filed a grievance alleging discrimination and retaliation, which the Law Department rejected due to Mr. Grishaber's assertion that I was being disciplined for a serious matter - presumably other than the charge of Insubordination which he used to remove me from my classroom and school. In August 2022 I was informed of an investigation into alleged Misconduct. I met with the Investigator - Ms. Pamela Laughlin Childs <plardlightinv@gmail.com> - for over three hours, and learned of the nature of the false allegations made against me by Lisa Wagner, whom I complained of in Fall 2019. As she remained my Inclusion Teacher after I had complained about her, I suspect that she was taking notes on my interactions with students and portraying them as discriminatory. The allegations seemed also to be of a nature related to terrorist-like threats that she falsely attributed to me. This confirms to me that all of the allegations made against me since complaining of mistreatment by Lisa Wagner in Fall 2019 were retaliatory, and that Mr. Grishaber's bias against me enabled such retaliation. In October 2022 I was finally contacted by an EOCO Investigator - Ms. Khyra Kolidakis - but was disappointed to hear that she had spoken with Mr. Grishaber and recorded his false allegations against me, but had no record of my having complained to the EOCO. The next day I had a hearing with the Office of Administrative Hearings over the payment for the Substitute Teaching assignment I completed in January. I then learned of CPS's Position Statement, which seemed to defend the false allegations made against me. I feel that since I have disproved the allegation of Insubordination, they have now taken the side of Mr. Grishaber and the false allegations of Misconduct for which I hold him responsible for making against me. I further feel that these allegations are retaliatory and were made due to my Middle Eastern ancestry, and that CPS is now liable for Mr. Grishaber's discriminatory treatment of myself. Today, February 22, 2023, I received CPS's Position Statement on my charge of discrimination and retaliation, which defends the false allegations made and adverse actions taken against me despite the fact that they have been disproven in the course of the Office of Inspector General's investigation, which I believe to be ongoing. It also indicates that Lisa Wagner made a false report to the police about me on January 29, 2022, in apparent retaliation for complaining of her discriminating against me in the Fall of 2019.

Name, job title, location, and telephone number of any witness to any incident(s) reported above.

Kerstan Crowe, Regular Teacher; Ryan Glowacz, Assistant Principal

Prior to bringing this complaint, has the complainant described the alleged situation to anyone, including supervisor personnel or co-workers employed by the Board of Education?

No

Please list the name, job title, work location, and telephone number of any person to whom the complainant described the incident.

Adriana Cervantes, Chicago Teachers Union Field Representative; Pamela Laughlin Childs <plardlightinv@gmail.com>, Office of the Inspector General

List the date or approximate date the complainant brought the incident to the other employee's attention.

Aug 30, 2022

Describe any action taken to investigate or resolve the alleged incident(s).

Interviewed with investigator for over 3 hours; conclusion uncertain.

Has the complainant filed a union grievance or claim with any other city, state, or Federal agency?

Yes


Please provide specific details to the previous question.


Grievance Number: 13556/22-06-084(ac)

Incident Details:

Mr. Grishaber, when assigned to intervene in order to resolve my EOCO complaint of Fall 2019, chose to enable Mrs. Wagner to retaliate against me due to their shared biases against me. When I complained of Mr. Grishaber's bias to the Network Chief on January 27, 2022, he prompted Mrs. Wagner to make false reports against me in order to have me removed from my teaching position and interrupted the course of the Student Teacher I was mentoring, causing me to lose out on a year's worth of tuition waivers to UIC. The statements she alleges that I made against fellow staff and administrators are false, as is the description of the alleged discrimination against students. Mr. Glowacz was the Assistant Principal overseeing our House Meetings during the 2019-2020 school year, and for Mrs. Wagner to go over his head and allege that my professional conduct was discriminatory and dangerous is completely inappropriate, as is Mr. Grishaber's repeating these false claims in defense of his hostile actions against me. Furthermore, the Law Department and the EOCO do not represent either Mr. Grishaber or Mrs. Wagner, and should not represent their false claims against me in defense of their inaction to protect me.

Supporting Documentation:

 **IMG_2153.jpg**

 **IMG_2154.jpg**

Posted by **Christopher L Chesnut**

 **Feb 22, 2023 at 1:48 pm**